

**United States District Court
Eastern District of Michigan, Northern Division**

Mark Alan Adams, In Pro Per & In Pauperous
9949 Van Cleve Road
Frankenmuth, MI 48734
Phone/SMS: 989 980 4418
Email: markaa1955@gmail.com

Case No. _____

Plaintiff

-v.-

Defendants

- (1) Mary Adams Semcken
- (2) Susan Kay Adams

STATE ACTORS – *public officials and licensees*
Lawers (in chronological order of complicity)

- (3) Darrell R. Zolton - P45626
- (4) Susan Williamson - P51383
- (5) Julie A. Gafkay - P53680
- (6) Travis I. Dafoe - P73059
- (7) Smith, Bovill, PC
- (8) Andrew D. Concannon #P49336
- (9) Loomis Ewert Parsley Davis & Gotting, PC
- (10) Catherine A. Jacobs - P32996
- (11) Mieke V. Weissert - P59287
- (12) Warren H Krueger - P74115
- (13) Andrew C. Titus - P69579 (+ 7 SCBA lawyers per Discovery)

State of Michigan Judges

- (14) Judge Fred L. Borchard - P11003, 10th Circuit Court, Chief Judge, retired
- (15) Judge Patrick J. McGraw - P34430 Saginaw County Chief Judge
- (16) Judge Janet M. Boes - P37714, 10th Circuit Court
- (17) William J. Caprathe #P11596, unlawful State appointed Judge
- (18) Judge. M. Randall Jurrens #P27637, 70th Dist.
- (19) Judge Terry L. Clark #P32605, 70th District
- (20) Judge M. T. Thompson, Jr. #P28291, 70th Dist., retired
- (21) Judge Kyle Higgs Tarrant #P24286, 70th Dist.

Hospitals & Doctors (in chronological order of complicity)

- (22) Covenant Health Care
- (23) Dr. Robyn Lorenzo, DO
- (24) Dr. Tiffany A Weiss-Feldkamp, DO
- (25) Health Source Saginaw
- (26) Dr. Ronald H. Bradley, DO, MD, PHD
- (27) Dr. Mark Zaroff, PhD
- (28) Dr. Kaushik Raval, MD

Demand for Jury Trial

**COMPLAINT FOR DAMAGES,
DECLARATORY AND INJUNCTIVE
RELIEF**

- (29) Dr. Sunil D. Parshar, MD
- (30) Mobil Medical Response MMR
- (31) Unnamed Pharmaceutical Companies and Doctors
(yet to be named and documented in Discovery)

Law Enforcement & Government Entities

- (32) Bridgeport Charter Township, Michigan
- (33) Bridgeport Police Department
- (34) City of Frankenmuth
- (35) Frankenmuth Police Department
- (36) Saginaw County
- (37) Saginaw County Sheriff Department
- (38) William Federspiel, Saginaw County Sheriff
- (39) Brenda Kappan, Saginaw County Sheriff Deputy
- (40) Saginaw County Prosecutor
- (41) John A, McColgan, Jr. P37168, Saginaw County Prosecutor
- (42) The State of Michigan
- (43) Michigan State Police
- (44) Trooper C Holt #724
- (45) Trooper N Olivio #331
- (46) Michigan Supreme Court
- (47) The United States of America
- (48) US Department of Justice
- (50) Federal Bureau of Investigation, FBI
- (51) Barry Rumble, FBI Agent
- (52) Anthony Kraudelt, FBI Agent

State Actors, Businesses & Licensees

- (53) David W. Schaefer, CPA
- (54) Yeo & Yeo Accountants
- (55) Max Friar, Managing Partner, Calder Capital
- (56) Calder Capital, LLC

State and National Organizations

- (57) American Bar Association
- (58) State Bar of Michigan
- (59) Saginaw County Bar Association
- (60) US Chamber of Commerce
- (61) Michigan Chamber of Commerce
- (62) Saginaw County Chamber of Commerce
- (63) Democratic National Committee
- (64) Republican National Party
- (65) Michigan Democratic Party
- (66) Michigan Republican Party

Miscellaneous Complicit Defendants

- (67) Police / Law Enforcement Unions (to be determined in Discovery)
- (68) Former Michigan Attorney General, Bill Schuette
- (69) Eric Holder, Former US Attorney General
- (70) Loretta Lynch, Former US Attorney General

- (71) Barack Hussein Obama, Former President of the United States
- (72) Willim P. Barr, Attorney General of the United States
- (73) Christopher A. Wray, FBI Director
- (74) Drug Enforcement Agency, DEA

All Complaints, as stated truthfully herein, are based on 3 immutable facts:

- 1) Human Rights protections provided by our US Constitution and its Amendments, State of Michigan Constitution, and United Nations Treaties are our birthright, unconditional, irrevocable, timeless and the supreme law of the land throughout the United States of America.
- (2) The US Supreme Court has ruled that NO ONE is above the law, not even the President of the United States.
- (3) As a decorated combat veteran in General Patton's Third Army, 65th Infantry Division, Captain Leo J. Adams took an Oath to defend the Constitution against all enemies, foreign and Domestic, which he honored until his dying day. He expected ALL others in public service who took similar Oaths to honor our Constitution and provide equal protections his family. This case arises out of the documented facts and evidence that ALL Defendant's in this case have willfully failed their Oaths in this regard.

This Complaint is abbreviated as relevant statements of fact and supporting evidence are included as Affidavits, and proofs of evidence to be subsequently attached to this Complaint and presented in Court to a jury of my peers.

Illegal, unethical and improper actions by Plaintiffs breach both Civil and Criminal laws. All law enforcement agencies and entities of government who actively seek to uphold our Constitutions and Rules of Law and prosecute all willful violators to the fullest extent will be happily removed as Defendants of this Complaint.

Plaintiff has lawfully filed this Complaint In Pro Per and in Pauperus and reserves the right to amend this Complaint, expand list of Defendants, Counts and allegations as additional facts, legal advice and representation become available.

VERIFIED COMPLAINT AND DEMAND FOR JURY TRIAL

Plaintiff, Mark Adams, In Pro Per and for his Complaint, under penalties for perjury, states the following is true and correct to the best of my knowledge and belief, and establishes probable cause that the following offenses have been committed:

Common Allegations, Jurisdictions and Venue

1. Plaintiff, Mark Adams is a citizen of the State of Michigan, residing in Tuscola County, Michigan.
2. Plaintiffs, land, personal and real properties, business entities, intellectual properties and trade secrets subject to this claim were located in Saginaw County, Michigan, USA.
3. Defendants of Saginaw County organized under the laws of the State of Michigan, Judges, Attorneys, Prosecutor, and law enforcement officials are all located in or work in Saginaw County, Michigan.
4. Defendants of Covenant Health Care and Health Source are located or work in Saginaw County, Michigan.
5. Defendants are or were at the time of the matters complained of acting under color of law and within the scope and course of their duties. Each defendant is sued in his individual and official capacity.
6. Defendant Mary Jo Adams Semcken resides in Evergreen, Ohio.
7. Defendant Susan Kay Adams resides in Powell, Ohio
8. All State Actors named as Defendants, including Lawyers, Judges, Doctors and law enforcement are licensed by the State of Michigan and under Oath
9. This action arises under the First, Fourth, Fifth, Seventh, Eighth and Fourteenth Amendments of the United States Constitution, made actionable by 42 USC § 1983, a full range of State and Federal statutes both Civil and Criminal committed in documented crime spree

10. Jurisdiction is conferred by 28 USC § 1331 and 42 USC § 1983 (federal question), and 28 USC § 1343 (civil rights). Supplemental jurisdiction for state law claims arise under 28 USC § 1367.
11. Venue is proper in the Eastern District of Michigan, Northern Division pursuant to 28 USC § 1391 in as much as the acts complained of occurred there, Plaintiff and the majority of Defendants reside or work there.
12. The rights of Plaintiff, Mark Adams, were all clearly established at the time acts complained of December 19, 2014 through October 5, 2016, including the depraved heart murder of Shirley Adams (July 15, 2020), confirmed unlawful taking of Mark Adams businesses, intellectual and personal properties (October 5, 2016). Public officials and extrajudicial acts are not entitled to qualified immunity. Multiple persistent violations of Adams' U.S. Constitutional rights and Rules of Law by Defendants include but are not limited to:
 - a) under the First Amendment to be free from wards of the court abridging his freedom of speech, the right of the people peaceably to assemble, and to petition the government for redress of grievances.
 - b) under the Fourth Amendment to be free from unreasonable searches, seizures including excessive force.
 - c) under the Fifth Amendment to not be deprived of life, liberty or property, without due process of law, nor shall private property be taken for public use without just compensation.

- d) Under the Sixth Amendment to not be falsely accused of criminal acts, inhumanely treated and prosecuted like a criminal, did not honor the right to a speedy and public trial, by an impartial jury of the state and district where are the alleged crimes shall have been committed, and to be informed of the nature and causes of the accusations; to be confronted with the witnesses against him; to have compulsory process for obtaining witnesses in his favor, and to have the assistance of counsel for his defense.
- e) under the Seventh Amendment, in suits at common law, the right of trial by jury shall be preserved.
- f) under the Eighth Amendment, to not have excessive fines imposed, nor cruel and unusual punishments inflicted.
- g) Under the Fourteenth Amendment, to not be subjected to the arbitrary and unlawful making and enforcement of laws which abridge the privileges or immunities of citizens of the United States; deprived Plaintiff of life, liberty, and property, without due process of law; and not be denied rights to equal protection of the laws.

13. The illegal acts of each Defendant were undertaken intentionally, willfully, wantonly, maliciously, and with callous disregard for Mark Adams rights, Shirley Adams rights, Mark Adams wholly owned businesses (ie. Adams Oil Enterprises, Inc., Tribology Testing Labs, Dr. Buggs Remedies, personal and business properties (including but not limited to intellectual properties, trade secrets, private brands, personal and business assets of

Mark Adams, military contractors Boeing, Raytheon, United Technologies, Siemens, NAVAIR and other clients he was duty-bound to protect), health and well-being of Mark Adams and his Mother he was duty-bound to protect and defend, entitling him to damages, punitive damages under federal law and exemplary damages under state law.

14. The First Amendment of the United States Constitution prohibits retaliation against a citizen for the criticism of public employees and public officials concerning the exercise of their public functions, even while they may be performing those functions.

Common Allegations of Fact

15. Plaintiff incorporates by reference all paragraphs above and below as though fully stated herein.
16. Plaintiff Mark Adams is seeking full restoration of his civil rights, liberty, freedoms, and property owners' rights, plus damages.
17. Plaintiff Mark Adams is also seeking vigorous law enforcement, prosecution, justice and protections for fellow Americans from all criminal Plaintiffs who violated their respective Oaths; US Constitution and Bill of Rights; Federal State, and International Rules of Law; UN Convention on Human Rights, the Inter-American convention on Forced Disappearance of Persons, all other applicable International human rights, trade and commerce treaties.
18. Defendants collective State and Federal criminal acts documented in this case include conspiracy, acts of domestic terrorism, numerous individual

obstructions of justice, fraud, perjury, making false statements, extortion, grand theft, computer crimes, malpractice, retaliating against witnesses and crime victims, obstruction of criminal investigations of healthcare offenses (18 USC Chapter 73), aiding and abetting the criminals, and ultimately the wrongful death / extrajudicial killing / depraved heart murder of Shirley Adams.

19. State of Michigan Judges, at the behest of Defendant attorneys, ruled and ordered that US Federal Constitution and State of Michigan Constitutions do not apply to Adams and his property.

20. This was a selective persecution as Adams has been a lifelong human rights advocate, environmental activist and peaceful resistor of tyranny

21. Adams has never had a fair jury trial in Saginaw County, State of Michigan or United States of America Courts.

22. A fraudulent and baseless lawsuit was initiated by Defendants (1) (2) and their prosecuted by their hired Attorneys . Trial was scheduled for when Adams was in Europe on business and unable to obtain court notifications or participate in court proceedings. Adams was tried in absentia, and his human rights violated in numerous ex-parte hearings.

23. State Actors persistently pursued bullying and initiatives that selectively infringed on Adams civil rights, sought to destroy all material improvements Adams invested in, destroy all positive economic developments and lawful land uses, attempting to drive him out.

24. Adams was well mannered, conducted himself professionally and lawfully at all times.

25. Among the grievances are alleged wrongdoings including violations of human rights, the State Open Meetings Act and Freedom of Information Act, police brutality, harassment, corruption, trespassing, fraud and more.

26. Adams never resisted or attempted to get away.

27. Further, during the course of the false arrest and detainment, Defendants injured Adams wrists and shoulders during the handcuffing process and the unduly rough treatment that followed.

28. State Actors obstructed justice, failed to uphold Adams civil rights, refused to investigate or charge his assailants.

29. Adams was so traumatized, emotionally and physically abused by Defendants, he has lived ever since in fear that sustained retributions will become progressively worse and more life-threatening.

30. Mark Adams was primary caregiver of his widowed 90-year old mother, Shirley Adams, who suffered greatly as Adams was no longer free to care for her every need on a daily basis, protect, defend, emotionally and financially support his Mother as he had done over a decade prior to State Actors and public officials initiating unconstitutional initiatives against him.

31. Shirley Adams suffered extreme emotional and physical duress inflicted upon her as the direct result of State Actors' actions against her son, Mark

Adams. Plaintiff never saw his mother alive again after December 8, 2014 as a direct result of Defendants collective actions against him.

32. Plaintiff Mark Adams was jailed and detained multiple times with multiple unconstitutional Warrants, at the behest of Defendants

33. On Tuesday, March 24, 2015, Adams was arraigned before Judge Kyle Higgs Tarrant in a video tribunal from the jail. The arraignment was terminated abruptly before charges, warrants and remedies were discussed in reasonable detail, denying due process, by Sheriff Federspiel's Deputy who interrupted proceedings asking loudly "Your honor, do you want us to remove him? Adams was abruptly forcibly removed from the podium by Sheriff's Deputies, assaulted and injured again while in handcuffs in the hallway immediately outside the view and hearing of the Judge and returned to solitary confinement.

34. Adams was ultimately extorted \$6000 cash (traceable check, credit or debit cards not accepted) as an alternative to spending 300 days in jail as Township officials and Kloc sought for the dubious zoning "offenses" Warrants. Township initiatives were extreme, excessive and not consistent with penalties written into Township codes, none of which are jail-able offenses, all perfectly legal and economically desirable pursuits in nearly every other jurisdiction in the USA.

35. Adams was released from Saginaw County Jail after paying the \$6,000 extortion, as demanded by Defendants.

36. At all times, Adams complied with verbal commands, did not resist in any way. Unduly harsh treatments were unwarranted and retaliatory in nature.
37. Adams sought medical treatments at Genesys Hospital March 26, 2015 for injuries sustained in Sheriff Federspiel's custody, including neck, lower back, tailbone, bilateral knees, bilateral shoulders, bilateral elbows, right hand, bilateral thumbs, big toe on left foot, acute right wrist contusion and abrasion.
38. All lawful economic developments and recreational land uses have been halted by Bridgeport Township's Stop Work Order, since 2012.
39. Adams is one of our nation's leading scientists researching next generation biobased and biodegradable lubricants for agricultural, mobile equipment, railroad, automotive and off-road markets. The Township and County's deadheading Adams advanced research for over five years (which varieties of natural and bioengineered non-food oil producing plants are most efficacious and economical to grow in Michigan and field testing lubricants) hurts not only his businesses, but also farmers, our environment, economy, our nations' competitiveness in world markets, Adams rights to freely and fully engage in global trade.
40. Defendants have so far succeeded in the destruction of Adams off-the-grid farming initiatives, ordering removal of all solar lights, solar water pump and alternative energy sources from the land hurt not only Adams and his businesses, but our environment and economy.

41. State Actors and Lawyers have profited handsomely (at both Adams and taxpayers expense) for persistent harassments and unlawful takings of Adams rights since June 2011, committing multiple and extreme violations of The Lawyers Oath (ie. to support the Constitution of the United States et al), Michigan Rules of Evidence and Michigan Rules of Professional Conduct (ie. providing, dishonest and poor legal representation whose primary intent was to bias judges against Adams, conduct improper ex-parte communications with judges, etc).
42. Defendants / State Actors sought to perpetuate and escalate harassments and takings from Adams.
43. So long as there is no law enforcement within local, State and Federal jurisdictions willing to prosecute human rights violators, honor, protect and uphold Adams rights, the history of their actions and evidence shows Defendants will continue violating Adams and other good citizens' liberties and civil rights until they are stopped.
44. Defendants hostile and illegal actions violating Adams rights will force him to abandon his dreams and property if US Federal District Court fails to honor and uphold Adams civil rights and property owners rights in 2020.
45. For all the reasons set forth above, Plaintiff seeks to restore all lawful land uses and claim damages, noneconomic, compensatory, punitive, and exemplary from his injuries, losses inflicted on his farm, businesses, property, and family as well as compensation for all damages including but not limited to:

- a) Seizure, arrest, false charges, and unlawful detention;
 - b) Lost scheduled time with Mother and Daughter, each of whom lived separately from Adams;
 - c) Legal and medical expenses;
 - d) Mental anguish and emotional distress, embarrassment, loss of reputation and personal humiliation;
 - e) Loss of society and companionship;
 - f) Loss of civil liberties and enjoyment of life;
 - g) 'Chilling effect' on future First-Amendment expressions
 - h) Such other damages as are available under state and federal law.
46. The acts of the Defendants were undertaken intentionally, willfully, wantonly, recklessly, grossly negligently, with deliberate indifference and callous disregard for Plaintiffs health, safety, welfare, well-being, Constitutional Rights, Rules of Law entitling him to Damages, Punitive Damages under federal law and Exemplary Damages under state law, Declaratory and Injunctive Relief.

COUNT I
(Violation of First Amendment- 42 USC § 1983)
Civil Rights First Amendment Retaliation
State imposed silence re: extortion

1. Plaintiff restates and incorporates by reference each of the preceding paragraphs as though fully restated herein.
2. The primary reason Defendant was assaulted, abducted, drugged, detained and falsely imprisoned by Plaintiffs was to punish and retaliate against

Adams for engaging in First Amendment protected expression. There was no probable cause.

3. The acts complained of above, resulting in the incarceration, abduction of Adams, constituted retaliation for Plaintiffs exercise of his first amendment right to criticize public officials.
4. Punishments of Adams initiated by Defendants were extreme and out-of-proportion to Adams alleged "crimes.
5. Adams lost everything, including his Mother, Shirley Wruck Adams, businesses, intellectual and private property. The purported goals of the Defendants was to be rid of Shirley Adams and Mark Adams for good, loot their estates, businesses, trade secrets, and intellectual properties of Adams and his clients.
6. The acts of the Defendants in response to little more than Plaintiffs words constituted a violation of Plaintiff's right to criticize public employees, exercise free speech and petition for redress of grievances under the First Amendment, subjecting him to unconstitutional retaliation in violation of his first amendment rights, entitling him to damages, as set forth above.

WHEREFORE, Plaintiff prays this Honorable Court enter judgment against the Defendant, in whatever amount was fair, just and equitable for the injuries and damages, compensatory and punitive, wrongfully sustained by Plaintiff, for his unreasonable seizure, search and detention, together with interest, costs and attorney fees under 42 USC § 1988.

COUNT II
(Violation of Fourth Amendment- 42 USC § 1983)

Unreasonable Seizure and Prosecution Without Probable Cause

7. Plaintiff restates and incorporates by reference each of the preceding paragraph as though fully restated herein.
8. The acts of physically seizing, restraining, abducting, assaulting, cutting off victims clothing, taking blood DNA and body fluids, jamming a tube down the length of his penis, forced drugging with injections of debilitating drugs off-label, detaining, terrorizing, numerous involuntary injections drugs not prescribed by his doctors without probable cause constitute an unreasonable seizure and prosecution without probable cause, depriving Adams of his liberty, in violation of the Fourth Amendment of the U.S. Constitution and made actionable by 42 USC § 1983.

WHEREFORE Plaintiff prays this Honorable Court enter Judgment against the Defendants, in whatever amount is fair, just and equitable for the injuries and damages, compensatory and punitive, wrongfully sustained by Plaintiff, for his unreasonable seizure, certain detention, together with interest, costs and attorney fees under 42 USC § 1988.

COUNT III
(Violation of Fourth Amendment- 42 USC § 1983)
Common Law False Arrest and Imprisonment

9. Plaintiff incorporates by reference all paragraphs above and below as fully stated herein.
10. The acts of the Defendants described above constituted common-law false arrest and imprisonment of Plaintiff Mark Adams.

11. The Defendants intentionally restrained, detained and confined Adams, depriving him of his liberty by actual and implied force (forced injections of off-label and debilitating prescription drugs).
12. Defendants proceeded to place Adams under arrest, handcuff and shackle him in leg irons like a slave, and place him in the back of the squad car.
13. Adams was conscious of his direct confinement.
14. The actions of defendants against Plaintiffs who committed no offense, constituted common-law false arrest and imprisonment, entitling him to damages set forth above.

WHEREFORE Plaintiff prays this Honorable Court enter judgment against Defendants, in whatever amount that is fair, just and equitable for the injuries and damages, both compensatory and exemplary, for the unreasonable injuries searches and detentions, together with interest, costs and attorney fees under 42 USC § 1988.

COUNT IV
(Violation of Fourth Amendment- 42 USC § 1983)
Unreasonable Seizures in the form of Excessive Force

15. Plaintiff restates and incorporates by reference each of the preceding paragraphs as though fully restated herein.
16. The actions of Defendants undertaken against plaintiff described above, in particular injuries to Plaintiff causing prolonged pain, suffering and medical maltreatment where Plaintiff offered no resistance, constituted an unreasonable seizure in the form of excessive force pursuant to the U.S. Constitution made actionable by 42 USC § 1983, whereby Plaintiff suffered damages set forth above.

WHEREFORE Plaintiff prays this Honorable Court enter judgment against the Defendants, in whatever amount is fair, just and equitable for the injuries and damages, both compensatory and punitive, wrongfully sustained by Plaintiff, for the unreasonable seizure, search and detention, together with interest, costs and attorney fees pursuant to 42 USC § 1988.

COUNT V

Violation of Fifth Amendment- 42 USC § 1983

Nor shall any person be deprived of life, liberty, or property, without due process of law, nor shall private property be taken for public use without just compensation.

17. Plaintiff restates and incorporates by reference each of the preceding paragraphs as though fully restated herein.
18. pursued persecutions go which was lawfully.
19. The actions of Defendants undertaken against Plaintiff described above, in particular violations of 5th Amendment of the US Constitution. Plaintiff Mark Adams was deprived of life, liberty, and all lawful uses of property without due process of law and deprived of lawful utilization of private property taken under premise of "for the public good and benefit of society" without just compensation.

WHEREFORE Plaintiff prays this Honorable Court enter judgment against Defendants, in whatever amount is fair, just and equitable for the injuries and damages, compensatory, exemplary and punitive, wrongfully sustained by Plaintiff, by forcibly taking his life, liberty, and property, without due process of law, together with interest, costs and attorney fees.

COUNT VI

Violation of Seventh Amendment- 42 USC § 1983

The Right to Trial by Jury shall be preserved

WHEREFORE Plaintiff prays this Honorable Court enter judgment against Defendants, in whatever amount is fair, just and equitable for the injuries and damages, compensatory, exemplary and punitive, wrongfully sustained by Plaintiff, by forcibly taking his life, liberty, and property, without due process of law, together with interest, costs and attorney fees.

COUNT VII

**Violation of Eighth Amendment- 42 USC § 1983
Nor cruel and unusual punishments inflicted.**

20. Plaintiff restates and incorporates by reference each of the preceding paragraphs as though fully restated herein.
21. The actions of Defendants undertaken against Plaintiff described above, in particular violations of 8th Amendment by inflicting excessive cruel and unusual punishments not imposed on other citizens and properties similarly situated.

WHEREFORE Plaintiff prays this Honorable Court enter judgment against Defendants, in whatever amount is fair, just and equitable for the injuries and damages, compensatory, exemplary and punitive, wrongfully sustained by Plaintiff, by imposing excessive fines, cruel and unusual punishments, together with interest, costs and attorney fees.

COUNT VIII

**Violation of Fourteenth Amendment- 42 USC § 1983
Made and enforced laws which abridge the privileges and immunities of citizens of the United States; Deprived Plaintiff of life, liberty, and property, without due process of law**

22. Plaintiff restates and incorporates by reference each of the preceding paragraphs as though fully restated herein.
23. The actions of Defendants undertaken against Plaintiff described above, in particular violations of 14th Amendment Section 1; made and enforced common laws which abridge the privileges or immunities of citizens of the United States; deprived Plaintiff of life, liberty, and property, without due process of law; denied Adams rights to equal protection of the laws, pursuant to the U.S. Constitution made actionable by 42 USC § 1983, whereby Plaintiff suffered damages set forth above.
24. Government officials expressed animus against the plaintiff.
25. Government officials treated Adams and his property differently than other similarly situated property within its jurisdiction.
26. Defendants violated Mark Adams 14th Amendment Due Process and Equal Protection rights when they selectively assaulted Adams, constituting a government takings of Adams property adversely affecting land utilization and value.
27. Defendants violated Adams 14th Amendment Due Process and Equal Protection rights
28. Defendants have no rational explanation for applying unwarranted and persistent limitations on Plaintiff and to the Plaintiffs' property since 2011, but not to other persons or similarly situated properties within its jurisdiction.

29. The Equal Protection Clause prohibits discrimination by government which either burdens a fundamental right, targets a suspect class, or intentionally treats one differently than others similarly situated without any rational basis for the difference.

WHEREFORE Plaintiff prays this Honorable Court enter judgment against Defendants, in whatever amount is fair, just and equitable for the injuries and damages, compensatory, exemplary and punitive, wrongfully sustained by Plaintiff, by forcibly taking his life, liberty, and property, without due process of law, together with interest, costs and attorney fees.

COUNT IX
Assault and Battery

30. The Plaintiff restates and incorporates by reference each of the preceding paragraphs as though fully restated herein.

31. The actions of Defendants in injuring Plaintiff during the course of arrest and incarceration where unnecessary and as much as plaintiff offered no resistance and therefore constituted a common law assault and battery by Defendants against Plaintiff.

32. As a result, Plaintiff suffered the damage as set forth above.

WHEREFORE Plaintiff prays this Honorable Court enter judgment against Defendants, in whatever amount is fair, just and equitable for the injuries and damages, compensatory, exemplary and punitive, wrongfully sustained by Plaintiff, for the unreasonable seizure, search and detention, together with interest, costs and attorney fees.

COUNT X
False Imprisonment

33. Plaintiff restates and incorporates by reference each of the preceding paragraphs as though fully restated herein.

WHEREFORE Plaintiff prays this Honorable Court enter judgment against Defendants, in whatever amount is fair, just and equitable for the injuries and damages, compensatory, exemplary and punitive, wrongfully sustained by Plaintiff, by forcibly taking his life, liberty, and property, without due process of law, together with interest, costs and attorney fees.

COUNT XI
Common Law and Statutory Malicious Prosecution

34. Plaintiff restates and incorporates by reference each of the preceding paragraphs as though fully restated herein.

35. The acts of Defendants described above constituted common law malicious prosecution of Adams.

36. Defendants also violated MCL 600.2907, the Michigan malicious prosecution statute.

37. State Actors instituted proceedings against Adams with malice, for a purpose other than that of securing the proper adjudication of the charges on which the proceedings were based.

WHEREFORE Plaintiff prays this Honorable Court enter judgment against Defendants, in whatever amount is fair, just and equitable for the injuries and damages, compensatory, exemplary and punitive, wrongfully sustained by

Plaintiff, by forcibly taking his life, liberty, and property, without due process of law, together with interest, costs and attorney fees.

COUNT XII

Intentional & Negligent Infliction of Emotional Distress

38. Plaintiff restates and incorporates by reference each of the preceding paragraphs as though fully restated herein.
39. The acts of Defendants undertaken out of anger and animus toward Adams, were designed to terrify, intimidate Adams, Adams mother, daughter, and employees, constituting the intentional infliction of emotional distress under the common law of the state of Michigan, resulting in the damages set forth above.

WHEREFORE Plaintiff prays this Honorable Court enter judgment against Defendants, in whatever amount that is fair, just and equitable for the injuries and damages, both compensatory and exemplary, for the unreasonable injuries, search and detention, together with interest, costs and attorney fees.

COUNT XIII

Municipal Liability

40. Plaintiff restates and incorporates by reference each of the preceding paragraphs as though fully restated herein.
41. As Saginaw County Sheriff, William Federspiel actively upholds, protects, defends and serves the acts of the final policymakers with respect to law enforcement and therefore represents municipal policy.
42. As Saginaw County Prosecutors, John McColgan and Saginaw County prosecutors actively uphold, protect, defend and serve the acts of the final

policymakers with respect to law enforcement and therefore represents municipal policy.

43. As Attorney General of Michigan, Bill Schuette actively upholds, protects, defends and serves the acts of the final policymakers with respect to law enforcement and therefore represents municipal policy.

44. The policy of using excessive force in the course of civil court proceedings, the subsequent arrest, transport and incarceration of political prisoners represent the policy of the County and State itself.

45. Defendants policies directly and proximately caused the damages suffered by Plaintiff Mark Alan Adams.

46. As Saginaw County Sheriff, the acts of Defendant William Federspiel and Deputy Brenda Kaprun represent the acts of the final policymaker with respect to law enforcement and therefore represent municipal policy.

47. The life-threatening policies of using excessive force, brutally injecting victim with debilitating and psychoactive drugs, denying Plaintiff's doctor prescribed vital medications including blood pressure medication, pressuring Adams to ingest drugs not properly prescribed by a licensed medical doctor, while inflicting severe stress, both physical and mental, on Defendant in the course of incarceration represents the reckless, irresponsible and potentially deadly policies inflicted on Plaintiff by Saginaw County the State of Michigan, policymakers

48. Defendants Saginaw County and State of Michigan policies directly caused the damages suffered by Plaintiff.

49. Defendants collective actions lacked a rational basis

50. Defendants collective actions were motivated by animus or ill-will.

WHEREFORE, Plaintiff Mark Adams prays that this Honorable Court enter judgment against Defendants in whatever amount that is fair, just, and equitable for the injuries and damages for the use of excessive force against him, together with interest, costs, and attorney fees pursuant to 42 USC §1988.

COUNT XIV
Negligence

51. Plaintiff restates and incorporates by reference each of the preceding paragraphs as though fully restated herein.

WHEREFORE Plaintiff prays this Honorable Court enter judgment against Defendants, in whatever amount is fair, just and equitable for the injuries and damages, compensatory, exemplary and punitive, wrongfully sustained by Plaintiff, by forcibly taking his life, liberty, and property, without due process of law, together with interest, costs and attorney fees.

COUNT XV
Abuses of Women, Elderly and Disabled Persons

52. Plaintiff restates and incorporates by reference each of the preceding paragraphs as though fully restated herein.

WHEREFORE Plaintiff prays this Honorable Court enter judgment against Defendants, in whatever amount is fair, just and equitable for the injuries and

damages, compensatory, exemplary and punitive, wrongfully sustained by Plaintiff, by forcibly taking his life, liberty, and property, without due process of law, together with interest, costs and attorney fees.

COUNT XVI
Wrongful Death / Depraved Heart Murder

53. Plaintiff restates and incorporates by reference each of the preceding paragraphs as though fully restated herein.

WHEREFORE Plaintiff prays this Honorable Court enter judgment against Defendants, in whatever amount is fair, just and equitable for the injuries and damages, compensatory, exemplary and punitive, wrongfully sustained by Plaintiff, by forcibly taking his life, liberty, and property, without due process of law, together with interest, costs and attorney fees.

COUNT XVII
Personal Injury

54. Plaintiff restates and incorporates by reference each of the preceding paragraphs as though fully restated herein.

WHEREFORE Plaintiff prays this Honorable Court enter judgment against Defendants, in whatever amount is fair, just and equitable for the injuries and damages, compensatory, exemplary and punitive, wrongfully sustained by Plaintiff, by forcibly taking his life, liberty, and property, without due process of law, together with interest, costs and attorney fees.

COUNT XVIII

Fraud

55. Plaintiff restates and incorporates by reference each of the preceding paragraphs as though fully restated herein.

WHEREFORE Plaintiff prays this Honorable Court enter judgment against Defendants, in whatever amount is fair, just and equitable for the injuries and damages, compensatory, exemplary and punitive, wrongfully sustained by Plaintiff, by forcibly taking his life, liberty, and property, without due process of law, together with interest, costs and attorney fees.

COUNT XIX

Perjury

56. Plaintiff restates and incorporates by reference each of the preceding paragraphs as though fully restated herein.

WHEREFORE Plaintiff prays this Honorable Court enter judgment against Defendants, in whatever amount is fair, just and equitable for the injuries and damages, compensatory, exemplary and punitive, wrongfully sustained by Plaintiff, by forcibly taking his life, liberty, and property, without due process of law, together with interest, costs and attorney fees.

COUNT XX

Defamation / Slander

57. Plaintiff restates and incorporates by reference each of the preceding paragraphs as though fully restated herein.

WHEREFORE Plaintiff prays this Honorable Court enter judgment against Defendants, in whatever amount is fair, just and equitable for the injuries and

damages, compensatory, exemplary and punitive, wrongfully sustained by Plaintiff, by forcibly taking his life, liberty, and property, without due process of law, together with interest, costs and attorney fees.

COUNT XXI
Obstruction of Justice

58. Plaintiff restates and incorporates by reference each of the preceding paragraphs as though fully restated herein.

WHEREFORE Plaintiff prays this Honorable Court enter judgment against Defendants, in whatever amount is fair, just and equitable for the injuries and damages, compensatory, exemplary and punitive, wrongfully sustained by Plaintiff, by forcibly taking his life, liberty, and property, without due process of law, together with interest, costs and attorney fees.

COUNT XXII
State Sponsored Terrorism

59. Plaintiff restates and incorporates by reference each of the preceding paragraphs as though fully restated herein.

WHEREFORE Plaintiff prays this Honorable Court enter judgment against Defendants, in whatever amount is fair, just and equitable for the injuries and damages, compensatory, exemplary and punitive, wrongfully sustained by Plaintiff, by forcibly taking his life, liberty, and property, without due process of law, together with interest, costs and attorney fees.

COUNT XXIII
Violations of Crime Victims Rights

60. Plaintiff restates and incorporates by reference each of the preceding paragraphs as though fully restated herein.

WHEREFORE Plaintiff prays this Honorable Court enter judgment against Defendants, in whatever amount is fair, just and equitable for the injuries and damages, compensatory, exemplary and punitive, wrongfully sustained by Plaintiff, by forcibly taking his life, liberty, and property, without due process of law, together with interest, costs and attorney fees.

Count XXIV
Violations of Oaths

61. Plaintiff restates and incorporates by reference each of the preceding paragraphs as though fully restated herein.

WHEREFORE Plaintiff prays this Honorable Court enter judgment against Defendants, in whatever amount is fair, just and equitable for the injuries and damages, compensatory, exemplary and punitive, wrongfully sustained by Plaintiff, by forcibly taking his life, liberty, and property, without due process of law, together with interest, costs and attorney fees.

COUNT XXV
Civil RICO

62. Plaintiff restates and incorporates by reference each of the preceding paragraphs as though fully restated herein.

WHEREFORE Plaintiff prays this Honorable Court enter judgment against Defendants, in whatever amount is fair, just and equitable for the injuries and damages, compensatory, exemplary and punitive, wrongfully sustained by Plaintiff, by forcibly taking his life, liberty, and property, without due process of law, together with interest, costs and attorney fees.

COUNT XXVI
Violations of International Commerce and Human Rights Treaties +
International Rules of Law

63. Plaintiff restates and incorporates by reference each of the preceding paragraphs as though fully restated herein.

WHEREFORE Plaintiff prays this Honorable Court enter judgment against Defendants, in whatever amount is fair, just and equitable for the injuries and damages, compensatory, exemplary and punitive, wrongfully sustained by Plaintiff, by forcibly taking his life, liberty, and property, without due process of law, together with interest, costs and attorney fees.

COUNT XXVII.A
Claim for Declaratory and Injunctive Relief Under The Administrative
Procedure Act Relating to Defendants in Law Enforcement failures to
Comply with Federal and State Laws and Mandates from Congress that
contributed in any manner to Criminal Counts documented in
Complaint

64. Plaintiff restates and incorporates by reference each of the preceding paragraphs as though fully restated herein.

65. This is an action pursuant to the administrative procedures action unlawfully withheld; to hold unlawful and set aside agency action found to be arbitrary, capricious, and then abuse of discretion; to hold unlawful and set aside

agency action found to be not in accordance with law; and to hold on Laughlins of the side agency action found to be in excess of statutory authority or limitations, or sort of statutory right.

66. The actions of defendants challenged in this count of the complaint our final agency actions are which there is no other adequate remedy in a court other than via the federal mandamus statute 28 USC § 1361 (addressed in Count XXVII.B *infra*)

67. For all the reasons stated herein, plaintiffs are entitled to declaratory and injunctive relief remedy Defendants failure to comply with their nondiscretionary duty imposed by rules of law and Congress requiring Defendants to honor their Oath's, uphold citizens Constitutional Rights and Rules of Law, charge and prosecute all Violators of Criminal Law to the fullest extent of the law.

**COUNT XXVII.B
REQUEST FOR MANDAMUS RELIEF**

68. All of the forgoing and subsequent paragraphs are incorporated herein by reference, specifically including the paragraphs COUNT XXVII.A

69. The actions of defendants challenged in this town of the complaint our final agency actions are which there is no other adequate remedy in court.

70. For all the reasons stated herein, plaintiffs are entitled to injunctive relief via the federal mandamus statute 28 USC § 1361 to remedy Defendant's failures to comply with their nondiscretionary duties imposed by Rules of Law and Congress, to honor their Oath's, uphold citizens Constitutional

Rights and Rules of Law, charge and prosecute all Violators of Constitutional and Criminal Laws to the fullest extent of the law.

Concurrently, Defendants violated a host of Criminal Laws, State, Federal, and International Rules of Law. Federal, State and Local Law Enforcement entities are steadfastly refusing to honor, uphold and prosecute criminals in this case, including but not limited to the following crimes & statutes:

CRIMINAL COUNTS

Criminal Counts as documented in Plaintiffs Complaint, attached Affidavits and Proofs of Evidence/Exhibits:

RICO Statutes
State Sponsored Terrorism
Domestic Terrorism
Kidnapping
Depraved Heart Murder, 2nd and/or 3rd Degree Murder of Shirley Adams
Fraud
Extortion
Grand Theft
Obstructing Justice
Witness Tampering
18 USC § 1519 Destruction, alteration, or falsification of records
18 USC § 1962 Prohibited activities
18 USC § 1346 Scheme or artifice to defraud
18 USC § 876 Mailing threatening communications
18 USC § 1512 Tampering with a witness, victim
18 USC § 113 Assault
31 USC 3729 False Claims
18 USC § 1962 Racketeering Conspiracy
18 USC § 1519 Mail Fraud Conspiracy
18 USC § 1349 Wire Fraud Conspiracy
18 USC § 371 Conspiracy

Pharmaceutical companies, executives manufacturing and marketing psychotropic drugs are at least as dangerous and damaging as opiate abusers, if not more (as psychotropic drugs are forcibly administered by State actors against the will and without consent of victims, including Judge Borchard in this case). State and Federal opiate cases should serve as models for prosecution and recovery of damages. The following charges should be prosecuted against (unnamed) Pharmaceutical Companies, Hospitals and Doctors, include but not limited to:

- a) regarding Seroquel (and other drugs erringly prescribed and administered to Shirley Adams by Defendants without her knowledge or consent)
- b) all drugs illegally prescribed and injected by hospitals & staff with intent to disable/ damage Mark Adams (without his knowledge or consent).

31 USC 3729 False Claims

18 USC § 1962 Racketeering Conspiracy

18 USC § 1519 Mail Fraud Conspiracy

18 USC § 1349 Wire Fraud Conspiracy

18 USC § 371 Conspiracy

JURY DEMAND

Plaintiff hereby demands trial by jury on all accounts.

SIGNATURE AND VERIFICATION BY PLAINTIFF

I hereby verify and attest that all allegations and statements above are true to the best of my information, knowledge, and believe.

Respectfully Submitted,



Mark Alan Adams, In Pro Per

Date: July 15, 2020



Shannon Swartzendruber
Notary Public, Tuscola County, MI
Acting in Saginaw County, MI
My Commission expires: 03/19/2024



Notary

Date: July 15, 2020



The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Mark A Adams

(b) County of Residence of First Listed Plaintiff Saginaw County, Michigan
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)
In Pro Per

DEFENDANTS

Mary Adams Semcken

County of Residence of First Listed Defendant Jefferson County, Colorado
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
☐ 2 U.S. Government Defendant
- ☐ 3 Federal Question (U.S. Government Not a Party)
☒ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|---------------------------------------|---------------------------------------|---|----------------------------|----------------------------|
| Citizen of This State | <input checked="" type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input checked="" type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input checked="" type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
☐ 2 Removed from State Court
☐ 3 Remanded from Appellate Court
☐ 4 Reinstated or Reopened
☐ 5 Transferred from Another District (specify)
☐ 6 Multidistrict Litigation - Transfer
☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
42 USC § 1983

Brief description of cause:

Defendants willfully and maliciously violated Plaintiff's Constitutional Rights and Rules of Law, including but not limited to 1st, 4th, 5th, 6th, 7th & 14th Amendments

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

Damages, Declaratory & Injunctive Relief

CHECK YES only if demanded in complaint:

JURY DEMAND:

☒ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

07/21/2010

SIGNATURE OF ATTORNEY OF RECORD

MAA Mark Adams